



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

December 17, 1993

Mr. Brad Bradley
USEPA-HSRL-6J
77 W. Jackson
Chicago, IL 60604

Re: 1190400007 -- Madison Co.
Taracorp/NL Industries
Superfund/Tech

Dear Brad,

Enclosed are comments pertaining to the review of the "Draft Final Work Plan for Stabilization of Hazardous Wastes in Granite City, Madison, and Venice, Illinois, Associated with the NL Industries/Taracorp Superfund Site." Attachment 1 consists of work plan comments and Attachment 2 contains comments generated from the ARAR review. In an effort to reduce duplicative comments, those comments relating to sections of the ARAR review are not duplicated in the Work Plan comments. Both attachments are to be incorporated into the final work plan.

As you know, I will be out of the office until January 4, 1994. Terry Ayers has been informed of the details of this review if you need to contact someone from the Agency in my absence. Terry can be reached at 217/782-6760.

Sincerely,

Brian Culnan, Remedial Project Manager
Federal Site Management Unit
Remedial Project Management Section
Bureau of Land

ATTACHMENT 1

WORK PLAN COMMENTS

1. Section 2.6. Page 2-4. Please remove visual from "visual/verification sampling" in the last sentence.
2. Section 2.7.3. Page 2-6. The referenced site drawing was not provided.
3. Section 2.7.5. Pages 2-8 to 2-10. Please address dust control measures in the following process stages:

Soil Debris and Grinding
Material Feeding
4. Section 2.7.8. Page 2-11. Please address possible emission sources in comment 3 above.
5. Section 3.1.1. Page 3-1. Include special waste biannual reports for non-hazardous special waste disposal at facilities outside of Illinois, in the submittals paragraph.
7. Section 3.3.2.1. Page 3-3. Insert a sentence describing placement of excavated wastes into bags, prior to the last sentence on the page.
8. Section 3.3.2.1. Top of page 3-4. Delete "hazardous waste landfill" from the sentence.
9. Pages 1-1, and 1-2 of the CSAP are missing.

ATTACHMENT 2

REVIEW OF APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

Comments are generated from the RCRA Part B Permit Application Decision Guide. A listing of items in the guide that were either applicable but not addressed adequately, or items that were not originally included in the Work Plan as applicable requirements follows. Please amend the Work Plan to incorporate the following comments.

1. B-2, and B-2a. Maps were not provided for the proposed stabilization location.
2. B-3a, and B-3b. It was not demonstrated that the seismic standard and the floodplain standards are met.
3. B-4. Traffic information is not provided. Please address the bulleted items in the RCRA PART B PERMIT APPLICATION DECISION GUIDE.
4. C-1, and C-2. Prior to treatment operations, one representative sample of the hazardous residential locations should be analyzed for the full TCLP list contained on page 6-4, Table 6-2. If lead is the only constituent that fails TCLP, only TCLP lead will be required for treatment confirmation analysis. Proof of documentation that lead is the only hazardous constituent prior to treatment will be required to dispose of the treated material as a special waste.
5. C-2b and C-2c. To be included in the waste analysis plan is the following post treatment confirmation sample and analysis requirements. The IEPA RCRA Permit Section requires that only the first and last batches of processed material be sampled for every 400 cubic yards. For example, if 400 cubic yards of material is treated in one day, a sample is required from the first batch processed, and a sample from the last batch treated for a total of two samples. If 600 cubic yards is treated in one day, a sample is required from the first batch, the batch at 400 cubic yards, and the last batch at the end of the day. Additionally, samples should be obtained as a grab sample from within the treated material rather than at the exit point of the conveyor.
6. D-2. Please note that treatment of waste within the pugmill as specified, constitutes treatment in a tank system, and not treatment within a waste pile as proposed. The remaining items pertaining to treatment in tanks are applicable. The requirements for waste piles only applies for the placement and subsequent storage of hazardous waste prior to treatment. Placement of treated material in waste piles may not be

appropriate as proposed. It is suggested that treated material is loaded directly from the exit conveyor into roll-off boxes, and appropriately staged. A series of roll-off boxes can be more effectively managed. Once confirmatory analysis for successful treatment is received, the contents of the roll-off boxes can be disposed directly, while another series of boxes is awaiting of confirmation analysis, with a third series being filled with treated material.

7. D-2f(1)(b). The use of a 40 mil synthetic liner is not acceptable as proposed. IAC Title 35 Section 724.293(b) and (c) is applicable when constructing a liner. The use of bituminous concrete with a minimum thickness of 4 to 6 inches, bermed on the edges, with drive way areas for trucks and equipment with the 40 mil synthetic liner placed atop will be required. At the conclusion of treatment operations, the bituminous liner is to be run through the treatment process. The liner is to be constructed for both the treatment process equipment area and the waste pile storage area.

It is noted that the proposed location for treatment operations is already contaminated above 1000 ppm for lead, and is part of the remediation required under the Record of Decision (ROD). Therefore, a variance for the above requirement may be obtained as an option to preclude the construction of the bituminous liner, and to use only the synthetic liner as proposed. However, RCRA has indicated that it will be necessary to commit to excavating the entire Trust 454 property to a lead level below 1000 ppm at the conclusion of treating residential materials in lieu of the above requirement.

8. D-3. As noted above, the waste pile is applicable for only the storage of hazardous waste prior to treatment, and the requirements for a bituminous liner is applicable for waste piles as well. The remaining requirements of item D-3c must also be addressed.
9. D-3e. The bituminous liner should be sloped to allow the use of a sump to address the leachate collection and removal requirement.
10. D-3k. Requirements associated with treatment from within a waste pile are not applicable pursuant to comment 6 above.
11. F-2b(2) (a) and (b). Please include tank inspection requirements per comment 6 above.
12. I-1d(2). Please include closure of tank systems as an applicable requirement per comment 6 above.
13. I-1d(3). Please include closure of waste piles as an applicable requirement for the waste storage area.